

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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PIETER VAN DONGEN, Individually and on	:	Civil Action No. 1:11-cv-07320-VSB-JLC
Behalf of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff,	:	
vs.	:	LEAD PLAINTIFFS' NOTICE OF MOTION
	:	AND UNOPPOSED MOTION FOR
CNINSURE INC., et al.,	:	PRELIMINARY APPROVAL OF
	:	SETTLEMENT
Defendants.	:	
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TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, the Settlement Agreement with exhibits, and all prior pleadings and proceedings had herein, Lead Plaintiffs Jeff Schram and Linda Schram, by and through their attorneys, hereby move the Court, before the Honorable Vernon S. Broderick, United States District Judge for the Southern District of New York, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY 10007, for an order (1) granting preliminary approval of the proposed Settlement; (2) certifying the Class for settlement purposes; (3) approving the form and manner of giving notice of the proposed Settlement to the Class; and (4) setting a hearing date for final approval thereof, and a schedule for various deadlines relevant thereto.

DATED: March 19, 2014

Respectfully submitted,

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Lead Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on March 19, 2014, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on March 19, 2014.

s/ Ellen Gusikoff Stewart

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Mailing Information for a Case 1:11-cv-07320-VSB

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)